

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)

v.)

Case No. ~~11-cr-10432-WGY~~

11-cr-10342-WGY

(1) LAWRENCE AMIRTO,
(2) JAMON CASWELL, and
(3) WILLIAM TOTARO,
Defendants)

FILED UNDER SEAL

APPLICATION

The United States of America, by Assistant U.S. Attorney Kristina E. Barclay

11/1/11: Gendro

("Applicant"), pursuant to Title 18, United States Code, Section 3122, applies to the Court for an Order authorizing the installation and use of a pen register and a trap and trace device on telephone number (561) 901-5461, which is an AT&T Mobility LLC cellular telephone with International Mobile Subscriber Identity ("IMSI") number 310410389477435 and Electronic Serial Number ("ESN") 358429030562341,¹ which is subscribed to LAWRENCE AMIRTO at 4761 NW 28th Ave, Boca Raton, Florida (hereinafter the "Target Cell Phone"), and to any changed telephone number subsequently assigned the same IMSI or ESN number used by the Target Telephone.

In support of this application, your Applicant states as follows:

1. Applicant is an "attorney for the Government" as defined in Rule 1(b)(1) of the Federal Rules of Criminal Procedure, and therefore, pursuant to Section 3122 of Title 18, United States Code, may apply for an Order authorizing the installation and use of a pen register and a

¹The IMSI ("International Mobile Subscriber Identifier") and the ESN ("Electronic Serial Number") are unique identifying numbers for the computer chip that is installed into the cellular telephone. The IMSI number is unique to the named subscriber of the cellular telephone and can be transferred from one mobile telephone instrument to any similarly equipped telephone.

trap and trace device.

2. Applicant certifies that the United States Postal Inspection Service (the "USPIS") is conducting a criminal investigation of LAWRENCE AMIRTO, JAMON CASWELL and WILLIAM TOTARO and unknown others in connection with conspiracy and mail fraud in violation of 18 U.S.C. §§ 371 and 1341; that an Indictment charging AMIRTO, CASWELL and TOTARO with conspiracy and mail fraud in violation of 18 U.S.C. §§ 371 and 1341 was returned on October 19, 2011; that a warrant for AMIRTO's arrest was issued by this Court on October 19, 2011; that AMIRTO is currently a fugitive; that AMIRTO has used the Target Cell Phone; that this phone was still active as of October 21, 2011; that it is believed that the information to be obtained from the pen register and trap and trace device is relevant to the ongoing criminal investigation and, in particular, that it may assist in ascertaining the whereabouts of AMIRTO.

3. Applicant requests that the Court issue an Order authorizing for a sixty (60) day period the installation and use of a pen register to register numbers dialed or pulsed from the Target Cell Phone, and any changed telephone number subsequently assigned the same IMSI or ESN number used by the Target Cell Phone, to record the date and time of such dialings or pulsings, and to record the length of time the telephone receiver in question is off the hook for incoming and outgoing calls.

4. Applicant also requests that the Court issue an Order authorizing for a sixty (60) day period the installation and use of a trap and trace device, including the caller identification feature, to identify and register telephone numbers within the geographic limitations of the continental United States from which calls to the Target Cell Phone and any changed telephone number subsequently assigned to the same IMSI or ESN number used by the Target Cell Phone,

originate.

5. Applicant further requests that the Court order, pursuant to Title 18, United States Code, Sections 3123(b)(2) and 3124, the furnishing of all information, facilities, and technical assistance necessary to accomplish the installation and use of the pen register and the trap and trace device, including the caller identification feature, by AT&T Mobility LLC.

6. Applicant further requests that the Order be binding on any subsequent service provider which provides service to the Target Cell Phone upon service of a certified copy of this Order without further order of this Court being required.

WHEREFORE, it is respectfully requested that the Court grant an Order (1) authorizing for a sixty (60) day period the installation and use of a pen register to record numbers dialed or pulsed from the Target Cell Phone, and any changed telephone number subsequently assigned the same IMSI/ESN number used by the Target Cell Phone, and also to record the length of time the telephone receiver in question is off the hook for incoming and outgoing calls; (2) authorizing for a sixty (60) day period the installation and use of a trap and trace device, including the caller identification feature, to identify and register telephone numbers within the geographic limitations of the continental United States from which calls to the Target Cell Phone and any changed telephone number subsequently assigned the same IMSI or ESN number used by the Target Cell Phone, originate; (3) binding any subsequent service provider which provides service to the Target Cell Phone upon service of a certified copy of this Order without further order of this Court being required; and (4) sealing this application and the Court's orders (except for the original Service Provider Orders to be served on AT&T Mobility LLC). Applicant further requests pursuant to General Order 06-05 that the United States Attorney, through undersigned counsel, be provided copies of all sealed documents which the United States Attorney has filed in

this matter.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on November 1, 2011.



Kristina E. Barclay
Assistant U.S. Attorney